

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.)	Civil Action No. 04-10294-DPW
SECURITIES LITIGATION)	(Lead Case)
)	
THIS DOCUMENT RELATES TO:)	
ALL CASES)	
)	

**LEAD PLAINTIFF'S EXPEDITED MOTION TO SCHEDULE SINGLE HEARING
DATE FOR TWO DISCOVERY MOTIONS PENDING BEFORE THE COURT**

Pursuant to Local Rule 40.3, Lead Plaintiff BPI Global Asset Management LLP (“Lead Plaintiff”) respectfully requests that the Court continue the October 30, 2007, 2:00 p.m. hearing on defendant Sonus Networks, Inc.’s (“Sonus”) Motion for Protective Order (Docket No. 203), to coincide with the hearing on Lead Plaintiff’s Motion to Compel Production of Documents, which was filed on October 16, 2007 (Docket No. 211). Lead Plaintiff believes that having both discovery motions heard on the same day is in the interests of judicial economy and efficiency and will benefit both the Court and the parties. A single hearing date to consider both currently pending discovery motions will also help focus the issues concerning discovery, which are to be discussed at the hearing, pursuant to the Court’s October 16, 2007 Notice.

When the parties were asked to agree upon a hearing date in October for Sonus’s Motion for Protective Order, Lead Plaintiff informed all defendants that it would be filing a Motion to

Compel and requested that the parties propose to the Court a single hearing date for both motions in November. Defendants, for reasons unknown to Lead Plaintiff, did not agree. During the parties' meet and confer on the instant motion, counsel for Sonus proposed that both motions be heard on October 30, 2007, as Sonus apparently plans on filing its opposition to Lead Plaintiff's Motion to Compel by Monday, October 29, 2007. However, this obviously will not afford the Court or Lead Plaintiff an adequate opportunity to review and address the opposition papers, eliminates the possibility of any reply brief, and otherwise does not allow sufficient time to prepare for the hearing on this important motion. Lead Plaintiff's motion to compel concerns improper claims of attorney-client privilege and work product protection Sonus is asserting to withhold thousands of relevant documents. In addition, counsel for Lead Plaintiff expects to be traveling to Boston on October 29, which apparently will be the same day Sonus files its opposition papers.

For these reasons, Lead Plaintiff respectfully requests that the October 30, 2007 hearing on Sonus's Motion for Protective Order be continued to coincide with a hearing date on Lead Plaintiff's Motion to Compel Production of Documents.

Dated: October 22, 2007

Respectfully Submitted,

GOLD BENNETT CERA & SIDENER LLP

By /s/Solomon B. Cera

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LEAD PLAINTIFF'S LOCAL RULE 7.1(A) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for Lead Plaintiff hereby certifies that by email dated October 19, 2007, they sought to confer in good faith with opposing counsel regarding Lead Plaintiff's Expedited Motion to Schedule Single Hearing Date For Two Discovery Motions Pending Before the Court. Counsel for defendant Sonus Networks, Inc. ("Sonus") responded via an email dated October 22, 2007 suggesting that the Court could hear both motions at the October 30 hearing, as Sonus plans on filing its opposition to Lead Plaintiff's Motion to Compel the day before the hearing. As counsel for Lead Plaintiff presently expects to be traveling to Boston the day before the October 30 hearing, Lead Plaintiff will not have an opportunity to adequately review Sonus's opposition papers and prepare for a hearing on Lead Plaintiff's Motion to Compel the following day. Prior to the scheduling of the October 30 hearing date on Sonus's Motion for Protective Order, counsel for Lead Plaintiff had previously requested in emails dated October 3 and 9, 2007 that the parties agree that both motions be heard on a single date in November. Defendants refused to so agree.

Respectfully Submitted,

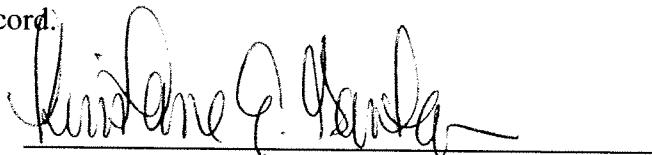
Dated: October 22, 2007

By: /s/Solomon B. Cera
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Attorneys for Lead Plaintiff
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CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby certify that on October 22, 2007, I electronically filed the foregoing documents: **“LEAD PLAINTIFF’S EXPEDITED MOTION TO SCHEDULE SINGLE HEARING DATE FOR TWO DISCOVERY MOTIONS PENDING BEFORE THE COURT; LEAD PLAINTIFF’S LOCAL RULES 7.1(A) AND 37.1(B) CERTIFICATION”** with the Clerk of the Court using the CM/ECF System which sent notification of such filing to all counsel of record.



KimLane E. Gantan